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ATTORNEY FOR DEBTOR(S)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

In Re:

James Martin Voss

Debtor(s)

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Case No. 20-50226

Chapter 13

Hearing: 08/28/2024 @ 11:00 a.m.

**RESPONSE TO TRUSTEE'S MOTION TO COMPEL DEBTOR TO
PROVIDE A COPY OF FEDERAL TAX RETURN**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the Debtor(s) in the above-styled and numbered cause and in support of the above entitled response would respectfully show the Court as follows:

1. Debtor(s) admit(s) the allegations contained in paragraphs one (1) through four (4) of the Trustee's motion.
2. Debtor(s) does(do) not recall receiving the "Request" referenced in paragraphs five (5) through seven (7) of the Trustee's motion. Accordingly, Debtor(s) does(do) not have sufficient information or knowledge of whether the Trustee mailed the "Request." Additionally, because Debtor(s) does(do) not recall receiving the referenced "Request," Debtor(s) does(do) not have sufficient information or knowledge to admit or deny the contents of the "Request." Thus, based on lack of information and knowledge, Debtor(s) denies(deny) the allegations contained in paragraphs five (5) through seven (7) of the

Trustee's motion.

3. Debtor(s) denies(deny) the allegations contained in paragraph eight (8) of the Trustee's motion.
4. Debtor(s) admit(s) that the requested tax return had not been provided when the present motion was filed as alleged in paragraph nine (9) of the Trustee's motion. However, Debtor(s) would show he/she/they has/have filed an Application for Automatic Extension of Time to File U.S. Individual Income Tax Return and has/have now furnished same to Trustee.
5. Debtor(s) admit(s) the allegations in paragraph ten (10) of the Trustee's motion.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) respectfully pray(s) that the Court deny the Trustee's Motion to Compel and that Debtor(s) have all further relief to which he/she/they may be entitled as is equitable and just.

Respectfully submitted,

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By: /s/ Sam Gregory
SAM GREGORY
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Attorney for Debtor(s)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Response was served on the parties below by the method indicated on this 5th day of July, 2024.

James Voss
P.O. Box 429
Post, TX 79356
Via First Class U.S. Mail

Katherine L. Davis
Chapter 13 Trustee
1407 Buddy Holly Ave.
Lubbock, TX 79401
Electronic Notice via CM/ECF

/s/ Sam Gregory
SAM GREGORY